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June 3, 1998

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Ms. Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: Time Warner Communications Holdings Inc. Petition
for Extension of Time of the Local Number
Portability Phases III and IV Implementation, CC
Docket No. 95-116; NSD File No. L-98-29; DA 98-1033

Dear Ms. Salas:

On May 22, 1998, Time Warner Communications Holdings Inc. ("TWComm") filed a Petition for Extension of Time ("Petition") to implement local number portability ("LNP"). TWComm sought an extension in one Phase III Metropolitan Statistical Area ("MSA"), Charlotte, NC, and three Phase IV MSAs, Honolulu, HI, Raleigh, NC, and Memphis, TN. The incumbent LECs serving these markets (BellSouth and GTE) have pending extension requests for LNP implementation for each of these MSAs.

In its Petition, TWComm asked the FCC to extend the relevant LNP deadlines to the extent the Commission extended the incumbent LECs' deadlines. TWComm stated that it did not plan to rely on the incumbent LECs for any LNP functionality and that it was technically capable of meeting the FCC's LNP deadlines even if the incumbent LECs did not do so. TWComm nevertheless sought an extension to avoid unnecessarily incurring the expense of "turning up" its LNP capability where the ILEC has not done so.

TWComm has now begun to consider seriously the possibility of relying on incumbent LECs to perform LNP functionalities (e.g., use of incumbent LEC databases). If TWComm ultimately decides to rely on the incumbent LECs in this manner, TWComm will not be able to provide LNP until the incumbent LEC has done so. Given this possibility, it is even more critical that the Commission grant TWComm's Petition.

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An original and four copies of this letter will be filed with the Office of the Secretary. Please call me if you have any questions regarding this letter or the Petition.

Sincerely,



Brian Conboy
Attorney for Time Warner
Communications Holdings Inc.

cc: Gail Radley Teicher
Jared Carlson
Patrick Forster